

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

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In re:	)	
	)	Chapter 11
	)	
FRANCHISE GROUP, INC., et al.,	)	Case No. 24-12480 (JTD)
	)	
	)	(Jointly Administered)
Debtors.	)	
	)	Re: Docket Nos. 7, 128
	)	
	)	Obj. Deadline: 12/3/24, 4:00 p.m.
	)	Hearing Date: 12/10/24, 10:00 a.m.
	)	

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VERIFIED STATEMENT PURSUANT TO RULE 2019  
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE

Pursuant to the provisions of Rule 2019 of the Federal Rules of Bankruptcy Procedure, Russell R. Johnson III of the Law Firm of Russell R. Johnson III, PLC files this Verified Statement of his firm's (the "Firm") multiple representations in this case of the following utility companies (the "Utilities") that provided prepetition utility goods/services to the Debtors, and continue to provide post-petition utility goods/services to the Debtors:

1. The names and addresses of the Utilities represented by the Firm are:

- A. Entergy Arkansas, LLC  
Entergy Louisiana, LLC  
Entergy Mississippi, LLC  
Entergy Texas, Inc.  
Attn: Jon Majewski  
Entergy Credit Department  
Building 1, L-JEF-359, 4809 Jefferson Hwy.  
Jefferson, Louisiana 70121

- B. Salt River Project  
Anthony Beck, Customer Credit Services PAB21T  
1667 N. Priest Drive  
Tempe, Arizona 85288-1231
- C. Florida Power & Light Company  
Attn: Knecole Stroman  
Revenue Recovery Department RRD/LFO  
4200 W Flagler St  
Coral Gables, Florida 33134
- D. Tucson Electric Power Company  
Attn: Adam D. Melton, Esq.  
Assistant General Counsel - Litigation  
88 E. Broadway Blvd.  
HQE910  
Tucson, Arizona 85701
- E. American Electric Power  
Attn: Jason Reid  
1 Riverside Plaza, 13<sup>th</sup> Floor  
Columbus, Ohio 43215
- F. Ohio Edison Company  
Potomac Edison Company  
West Penn Power Company  
Pennsylvania Electric Company  
Monongahela Power Company  
Metropolitan Edison Company  
Pennsylvania Power Company  
Jersey Central Power & Light Company  
Toledo Edison Company  
The Cleveland Electric Illuminating Company  
Attn: Kathy M. Hofacre  
FirstEnergy Corp.  
76 S. Main St., A-GO-15  
Akron, Ohio 44308
- G. Georgia Power Company  
Attn: Daundra Fletcher  
2500 Patrick Henry Parkway  
McDonough, Georgia 30253

- H. Baltimore Gas and Electric Company  
Atlantic City Electric Company  
Delmarva Power & Light Company  
Commonwealth Edison Company  
PECO Energy Company  
The Potomac Electric Power Company  
Attn: Lynn R. Zack, Esq.  
Assistant General Counsel  
Exelon Corporation  
2301 Market Street, S23-1  
Philadelphia, Pennsylvania 19103
- I. Tampa Electric Company  
Peoples Gas System, Inc.  
Attn: Barbara Taulton FRP, CAP, Florida Registered  
Paralegal  
Tampa Electric Company  
702 N. Franklin Street  
Tampa, Florida 33602
- J. New York State Electric and Gas Corporation  
Attn: Kelly Potter  
James A. Carrigg Center  
Bankruptcy Department  
18 Link Drive  
Binghamton, New York 13904
- K. Rochester Gas and Electric Corporation  
Attn: Shannon Lawson  
180 South Clinton Avenue  
Rochester, New York 14607
- L. Virginia Electric and Power Company d/b/a Dominion  
Energy Virginia  
Attn: Sherry Ward  
600 East Canal Street, 16<sup>th</sup> floor  
Richmond, Virginia 23219
- M. Dominion Energy South Carolina, Inc.  
Attn: Jay Bressler, Esq.  
220 Operation Way  
Cayce, South Carolina 29033

- N. The Connecticut Light & Power Company  
Yankee Gas Services Company  
Public Service Company of New Hampshire  
Eversource Gas of Massachusetts  
NStar Electric Company - Western Massachusetts  
Attn: Honor S. Heath, Esq.  
Eversource Energy  
107 Selden Street  
Berlin, Connecticut 06037
- O. PSEG Long Island  
Attn: Brianna Maye, Back Office Collections  
15 Park Drive  
Melville, New York 11747
- P. Southern California Edison Company  
Attn: Jeffrey S. Renzi, Esq.  
Director and Managing Attorney  
Southern California Edison Company, Law Department  
2244 Walnut Grove Avenue  
Rosemead, California 91770
- Q. CenterPoint Energy Resources Corp  
Jeannetta Johnson  
Credit Department, 31<sup>st</sup> Floor  
CenterPoint Energy, Inc.  
1111 Louisiana St.  
Houston, Texas 77002
- R. Orange & Rockland Utilities, Inc.  
Attn: Jennifer Woehrle  
390 W. Route 59  
Spring Valley, New York 10977
- S. Consolidated Edison Company of New York, Inc.  
Attn: Bankruptcy  
Customer Operations, Specialized Activities, 9th Floor  
4 Irving Place  
New York, New York 10003
- T. San Diego Gas & Electric Company  
Attn: Kelli S. Davenport, Bankruptcy Specialist  
8326 Century Park Court  
San Diego, California 92123

- U. Boston Gas Company  
KeySpan Gas East Corporation  
The Brooklyn Union Gas Company  
Massachusetts Electric Company  
Niagara Mohawk Power Corporation  
Attn: Vicki Piazza, D-1  
National Grid  
300 Erie Boulevard West  
Syracuse, New York 13202
- V. Constellation NewEnergy, Inc.  
Constellation NewEnergy - Gas Division, LLC
- W. Gexa Energy, LP ("Gexa")  
Attn: John Gray, Esq., Senior Counsel  
601 Travis Street, Suite 1400  
Houston, Texas 77002

2. The nature and the amount of claims (interests) of the Utilities, and the times of acquisition thereof are as follows:

(a) The following Utilities have unsecured claims against the above-referenced Debtors arising from prepetition utility usage: American Electric Power, Ohio Edison Company, Potomac Edison Company, West Penn Power Company, Pennsylvania Electric Company, Monongahela Power Company, Metropolitan Edison Company, Pennsylvania Power Company, Jersey Central Power & Light Company, Toledo Edison Company, The Cleveland Electric Illuminating Company, Virginia Electric and Power Company d/b/a Dominion Energy Virginia, Dominion Energy South Carolina, Inc., Georgia Power Company, PSEG Long Island, San Diego Gas and Electric Company, Southern California Edison Company, Baltimore

Gas and Electric Company, Commonwealth Edison Company, PECO Energy Company, The Potomac Electric Power Company, Delmarva Power & Light Company, Atlantic City Electric Company, Tampa Electric Company, Peoples Gas System, Inc., Eversource Gas of Massachusetts, The Connecticut Light & Power Company, Yankee Gas Services Company, Public Service Company of New Hampshire, NStar Electric Company - Western Massachusetts, Orange & Rockland Utilities, Inc., Consolidated Edison Company of New York, Inc., Constellation NewEnergy, Inc., Constellation NewEnergy - Gas Division, LLC, CenterPoint Energy Resources Corp., New York State Electric and Gas Corporation, Rochester Gas & Electric Corporation, Boston Gas Company, KeySpan Gas East Corporation, The Brooklyn Union Gas Company, Massachusetts Electric Company, Niagara Mohawk Power Corporation and Gexa Energy, LP.

(b) Salt River Project, Entergy Arkansas, LLC, Entergy Louisiana, LLC, Entergy Mississippi, LLC, Florida Power & Light Company and Tucson Electric Power Company held prepetition cash deposits that wholly secured prepetition debt.

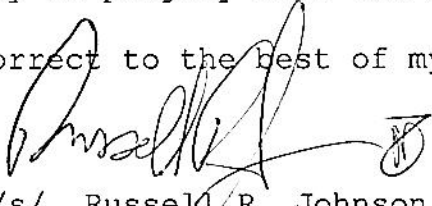
(c) For more information regarding the claims and interests of the Utilities in these jointly-administered cases, refer to the *Objection of Certain Utility Companies to the Debtors' Motion For Interim and Final Orders (I) Prohibiting*

*Utility Companies From Altering, Refusing, or Discontinuing Utility Services, (II) Deeming Utility Companies Adequately Assured of Future Payment, (III) Establishing Procedures For Resolving Objections By Utility Companies and Determining Additional Adequate Assurance of Payment, and (IV) Granting Related Relief (Docket No. 280) filed in the above-captioned, jointly-administered, bankruptcy cases.*

3. The Law Firm of Russell R. Johnson III, PLC was retained to represent the foregoing Utilities in November 2024. The circumstances and terms and conditions of employment of the Firm by the Utilities is protected by the attorney-client privilege and attorney work product doctrine.

I verify under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information and belief.

Date: December 3, 2024

  
By: /s/ Russell R. Johnson III  
Russell R. Johnson III (VSB No. 31468)  
LAW FIRM OF RUSSELL R. JOHNSON III, PLC  
2258 Wheatlands Drive  
Manakin-Sabot, Virginia 23103  
Telephone: (804) 749-8861  
E-mail: [russell@russelljohnsonlawfirm.com](mailto:russell@russelljohnsonlawfirm.com)